

EXHIBIT A

PROPOSED ORDER

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| <p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</p> | |
| <p>Caption in Compliance with D.N.J. LBR 9004-1(b)</p> <p>GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Matthew I.W. Baker, Esq. dstolz@genovaburns.com dclarke@genovaburns.com mbaker@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel for the Official Committee of Talc Claimants</i></p> | <p>BROWN RUDNICK LLP David J. Molton, Esq. Robert J. Stark, Esq. Michael S. Winograd, Esq. Eric R. Goodman, Esq. Kenneth J. Aulet, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com mwinograd@brownrudnick.com egoodman@brownrudnick.com kaulet@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 and Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. Sharon I. Dwoskin, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com sdwoskin@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p> |
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| | Fax: (212) 682-6104 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i> |
| In re: LTL MANAGEMENT LLC,¹ Debtor. | Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan |

**ORDER GRANTING MOTION OF THE OFFICIAL COMMITTEE OF TALC
CLAIMANTS FOR ENTRY OF AN ORDER, PURSUANT TO BANKRUPTCY CODE
SECTIONS 1103(c) AND 1109(b), GRANTING EXCLUSIVE LEAVE, STANDING,
AND AUTHORITY TO COMMENCE, PROSECUTE AND, IF APPROPRIATE,
SETTLE CERTAIN CAUSES OF ACTION ON BEHALF OF DEBTOR’S ESTATE**

Upon the *Motion of the Official Committee of Talc Claimants for Entry of an Order, Pursuant to Bankruptcy Code Sections 1103(c) and 1109(b), Granting Exclusive Leave, Standing, and Authority to Commence, Prosecute and, if Appropriate, Settle Certain Causes of Action on Behalf of Debtor’s Estate*, dated _____ [Docket No. _____] (the “Motion”)² filed by the Official Committee of Talc Claimants (the “TCC”) of LTL Management LLC, for entry of an order pursuant to sections 1103(c) and 1109(b) of the Bankruptcy Code granting the TCC exclusive leave, standing, authority to commence, prosecute, and, if appropriate, settle certain causes of action on behalf of the Debtor’s estate; and it appearing that (i) this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334; (ii) venue of this chapter 11 case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; (iii) this matter is a

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

core proceeding pursuant to 28 U.S.C. § 157(b); (iv) this Court having determined that the relief requested in the Motion is in the best interests of the Debtor, its estate, its creditors and other parties in interest; and (v) proper and adequate notice of the Motion has been given and that no other or further notice is necessary; after due deliberation thereon; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. All objections, if any, to the Motion or the relief requested therein, that have not been withdrawn, waived, or settled, are overruled.
3. The TCC shall be, and hereby is, granted, on behalf of the Debtor's estates, exclusive leave, standing, and authority to commence and prosecute the Causes of Action set forth in the Motion and the Draft Complaint.
4. The TCC is authorized, and shall have the right and authority, to negotiate and settle the Causes of Action on behalf of the Debtor's estate, subject to further order of this Court approving such settlements.
5. The TCC may amend or modify the Draft Complaint attached to the Motion prior to its filing.
6. The TCC is authorized and empowered to take all actions necessary to implement the relief granted in this Order.
7. Nothing in this Order shall affect in any way the TCC's rights to seek standing to bring additional causes of actions against the Defendants or any other party.

8. The Court shall retain jurisdiction to hear and determine all matters arising from, or related to, the construction, performance, enforcement, and implementation of the terms of this Order.

Dated: _____, 2023
Trenton, New Jersey

HONORABLE MICHAEL B. KAPLAN
UNITED STATES BANKRUPTCY JUDGE